

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAY 31 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) No. 4:16 MJ 5138-4 NAB
)
REBECCA ANN MILLER)
)
 Defendant.)

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Jeannette S. Graviss, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Aggravated Identity Theft in violation of 18 U.S.C. § 1028(a) and Bank Fraud in violation of 18 U.S.C. § 1344 .
2. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) the weight of the evidence against defendant;
 - (b) defendant's history and characteristics, including a lengthy criminal history of multiple arrests and convictions for fraud based offenses;
warrant defendant's detention pending trial.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

RICHARD G. CALLAHAN
UNITED STATES ATTORNEY

/s/ Jeannette S. Graviss

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